

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOSEPH S. GELMIS, Individually and on Behalf of	:	
All Others Similarly Situated,	:	Electronically Filed
	:	
Plaintiff,	:	
v.	:	
	:	
EARL W. COLE, III, MICHAEL L. FALCONE,	:	Civil Action No.: 1:08-cv-00980 (RMB)
WILLIAM S. HARRISON, MARK K. JOSEPH,	:	(ECF Case)
MELANIE M. LUNDQUIST, GARY A.	:	
MENTESANA, ROBERT J. BANKS, CHARLES	:	
C. BAUM, RICHARD O. BERNDT, EDDIE C.	:	
BROWN, ROBERT S. HILLMAN, DOUGLAS A.	:	
McGREGOR, ARTHUR S. MEHLMAN, FRED N.	:	
PRATT, JR., and MUNICIPAL MORTGAGE &	:	
EQUITY, LLC,	:	
Defendants.	:	
	:	
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<i>(Additional Captions on the Following Pages)</i>		

**THE RAWDEN GROUP'S NOTICE OF MOTION FOR
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS
AND APPROVAL OF CHOICE OF LEAD COUNSEL**

JULES ROTHAS, Individually and on Behalf of All :
Others Similarly Situated, :

Plaintiff, :

v. :

MUNICIPAL MORTGAGE & EQUITY L.L.C., :
MARK K. JOSEPH, MICHAEL L. FALCONE, :
WILLIAM S. HARRISON, MELANIE M. :
LUNDQUIST and DAVID B. KAY, :

Defendants. :

Electronically Filed

Civil Action No.: 1:08-cv-01120 (RMB)
(ECF Case)

ARNOLD J. ROSS, Individually and on behalf of all :
others similarly situated, :

Plaintiff, :

v. :

EARL W. COLE, III, MICHAEL L. FALCONE, :
WILLIAM S. HARRISON, MARK K. JOSEPH, and: :
MUNICIPAL MORTGAGE & EQUITY, LLC., :

Defendants. :

Electronically Filed

Civil Action No.: 1:08-CV-1299 (RMB)
(ECF Case)

ALEX D'ANGELO, Individually and On Behalf of :
All Others Similarly Situated, :

Plaintiff, :

v. :

MUNICIPAL MORTGAGE & EQUITY, LLC, :
MICHAEL L. FALCONE, WILLIAM S. :
HARRISON, EARL W. COLE, III, MARK K. :
JOSEPH, MELANIE M. LUNDQUIST, GARY A :
MENTESANA, CHARLES M. PINCKNEY :
ROBERT J. BANKS, CHARLES C. BAUM, :
RICHARD O. BERNDT, EDDIE C. BROWN, :
ROBERT S. HILLMAN, DOUGLAS A. :
McGREGOR, ARTHUR MEHLMAN and FRED N. :
PRATT, JR., :

Defendants. :

Electronically Filed

Civil Action No. 1:08-CV-1331 (RMB)
(ECF Case)

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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE THAT Joseph Rawden, Beth Rawden, Richard and Isabel Bordow, on behalf of the Richard/Liz Bordow Living Trust U/A 06/25/96 Isabel Bordow and Richard A. Bordow Trustees for the benefit of Isabel R. Bordow, and Niel Nielsen (collectively, the “Rawden Group”), on a date and time as may be set by the Court, before the Honorable Richard M. Berman, at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 21D, New York, New York, 10007, Movants will respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3)(B), for entry of an Order: (1) consolidating all the above-captioned actions and any related actions that may be filed under Rule 42(a) of the Federal Rules of Civil Procedure; (2) appointing Movants as Lead Plaintiff on behalf of themselves and all others similarly situated who acquired the securities of Municipal Mortgage & Equity, LLC from January 30, 2003 through January 29, 2008, inclusive and incurred damages as a result of the Defendants’ alleged violations of the federal securities laws; (3) approving Movants’ choice of the law firms of Labaton Sucharow LLP and Spector Roseman & Kodroff, P.C. to serve as Lead Counsel; and (4) granting such other and further relief as the Court may deem just and proper.

This Motion is supported by the accompanying Memorandum of Law, the Declaration of Andrei V. Rado and the exhibits annexed thereto; all of the prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by

the Court.

DATED: March 31, 2008

Respectfully submitted,

LABATON SUCHAROW LLP

By: /s/ Christopher J. Keller
Christopher J. Keller (CK-2347)
Andrei V. Rado (AR-3724)
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**SPECTOR ROSEMAN
& KODROFF, P.C.**

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Proposed Lead Counsel